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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(Honorable Barbara L. Major)

UNITED STATES OF AMERICA, Plaintiff, vs. Marco Antonio Contreras-Perez Defendant.	CASE NO. 08MJ1115 BLM NOTICE OF MOTION; MOTION FOR VIDEOTAPE DEPOSITION AND SUBSEQUENT VOLUNTARY DEPORTATION OF MATERIAL WITNESS; MEMORANDUM OF POINTS AND AUTHORITIES AND DECLARATION OF THOMAS G. GILMORE IN SUPPORT THEREOF DATE: May 20, 2008 TIME: 9:00 am PLACE: Courtroom of Magistrate Barbara L. Major

TO: UNITED STATES ATTORNEY; DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on April 15, 2008 at 9:30 a.m. or as soon thereafter as the matter may be heard, material witnesses Ruben Lopez-Basulto, Juan Castillo-Vega and Giovani Venancio-Nieves will move the Court for an Order that they be subjected to a videotape deposition prior to trial and subsequent voluntary deportation.

This motion will be based on 18 U.S.C. 3144 in that the witnesses testimony can be adequately secured by deposition and further detention is not necessary to prevent a failure of justice.

This motion is further based on this notice of motion, the memorandum of points and authorities and declaration of Thomas G. Gilmore filed herewith, and as such other and further evidence as may be presented at the hearing of the motion.

Respectfully submitted,

DATED: 4/29/08

/ss/Thomas G. Gilmore
THOMAS G. GILMORE, Attorney for Material Witnesses